

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JASMINE TORO, individually and as the  
representative of a putative class of similarly  
situated persons,

Plaintiff,

v.

GENERAL STORE, LLC,

Defendant.

Case No. 1:22-cv-06130-MKV

**DECLARATION OF JAMES  
JANTARASAMI IN SUPPORT OF  
DEFENDANT’S MOTION TO DISMISS**

The undersigned, an attorney duly admitted to practice law in the State of New York and in the United States District Court for the Southern District of New York, hereby deposes under penalty of perjury and says:

1. I am counsel for Defendant GENERAL STORE, LLC in the above-titled action. I submit this Declaration in support of Defendant’s motion to dismiss the Amended Complaint pursuant to FRCP 12(b)(1) and 12(b)(6). I am familiar with the facts and circumstances herein based on discussions with my client and a review of public records and other documents from files maintained in my office.

2. In the undersigned’s letter application for a pre-motion conference herein dated November 14, 2022 [ECF No. 8], Defendant made reference to a list of 21 “Carbon Copy Cases” (ADA cases substantively identical to this one) filed by Plaintiff Jasmine Toro from July 2022-September 2022.

3. Based on an updated PACER search, it appears that Plaintiff has since filed an additional 10 Carbon Copy Cases in the Southern District of New York, bringing the total count to 31. An updated list of the Carbon Copy Cases is annexed hereto as Exhibit A. The Court will note that the Hon. Mary Kay Vyskocil is currently assigned 4 of those cases.

4. The Court is respectfully referred to the annexed Memorandum of Law In Support of Defendant's Motion to Dismiss for a discussion of the legal authorities supporting the relief sought herein.

**WHEREFORE**, your deponent respectfully requests that Defendant's motion be granted in its entirety.

Dated: January 3, 2023  
New York, New York

/s/ James Jantarasami  
JAMES JANTARASAMI, ESQ